



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RQ-2

March 4, 2013

ANDREW A. STEVENS, TREASURER  
ARIZONA REPUBLICAN PARTY  
3501 NORTH 24TH STREET  
PHOENIX, AZ 85016

**Response Due Date**

**04/08/2013**

IDENTIFICATION NUMBER: C00008227

REFERENCE: OCTOBER MONTHLY REPORT (09/01/2012 - 09/30/2012)

Dear Treasurer:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. This notice requests information essential to full public disclosure of your federal election campaign finances. **Failure to adequately respond by the response date noted above could result in an audit or enforcement action.** Additional information is needed for the following 4 item(s):

1. Schedule A of your report discloses a receipt from "JOEPAC" totaling \$5,000 for the apparent misdeposit of contributions originally intended for the non-federal account (see attached). Please be advised, contributions deposited in a federal account must meet the following conditions: the contributions are designated or expressly solicited for use in connection with federal elections and contributors are informed that their contributions are subject to the limits and prohibitions of the Act. 11 CFR §102.5(a)

Please confirm that the conditions were met or amend your report to clarify this apparent discrepancy.

2. Itemized disbursements must include a brief statement or description of why each disbursement was made. Please amend Schedule B supporting Line 21(b) of your report to clarify the following descriptions: "Consulting Services," "Consulting services- Non FEA," "Contract labor- Non FEA," "Party consulting," "Party media & political consulting," "Political Consulting Service," and "Professional fees." For further guidance regarding acceptable purposes of disbursement, please refer to 11 CFR 104.3(b)(3)(i).

Additional clarification regarding inadequate purposes of disbursement published in the Federal Register can be found at [http://www.fec.gov/law/policy/purposeofdisbursement/inadequate\\_purpose\\_list\\_3507.pdf](http://www.fec.gov/law/policy/purposeofdisbursement/inadequate_purpose_list_3507.pdf).

## ARIZONA REPUBLICAN PARTY

Page 2 of 3

3. Schedule A supporting Line 12 discloses a transfer-in from "National Republican Congressional Commit." Schedule B supporting Line 21(b) reflects payments for "Bumper stickers pins signage" and "Romney signs." Please be advised that a state or local party committee may pay for campaign materials (such as pins, posters, bumper stickers and yard signs) that are distributed by volunteers in connection with activity on behalf of the party's nominees in a general election and for voter drive activity conducted on behalf of the party's Presidential and Vice Presidential nominees. Payments for this type of activity are exempt from the definition of a contribution or expenditure if certain conditions are met. The conditions are that no public advertising may be used, including distribution by direct mail (mailings by a commercial vendor or from commercial lists); all funds used for the activity must be permitted under the Act; none of the funds used may have been designated for a particular candidate; and finally, payments for the activity may not be made from transfers-in from the national committee to specifically fund the activity. For further guidance, please refer to 11 CFR §§100.87 and 100.147 and to the Campaign Guide for Party Committees.

If the activity disclosed on your report does not meet the definition of "exempt" activity as described above and if any portion of the expenditures were made on behalf of specifically identified candidates, that amount must be disclosed on Schedule B, E or F supporting Line 23, 24 or 25 of the Detailed Summary Page as appropriate. Please amend your report or provide clarifying information.

4. Your 2012 August Monthly (7/1/12-7/31/12), September Monthly (8/1/12-8/31/12) and October Monthly (9/1/12-9/30/12) Reports combined, do not disclose any payments for salary or wages on Schedule B supporting Line 30(b) of the Detailed Summary Page. 11 CFR §100.24 defines as Federal Election Activity, services provided by an employee of a State, district or local party committee who spends more than 25 percent of their time during that month on activities in connection with a Federal election. You are advised that payments for salaries and wages for employees who spend more than 25 percent of their compensated time in a given month on Federal Election Activity or activities in connection with a Federal election must be made with Federal funds only. Please provide clarification regarding the lack of payments for salary and wages disclosed by your committee.

**Please note, you will not receive an additional notice from the Commission on this matter.** Adequate responses must be received by the Commission on or before the due date noted above to be taken into consideration in determining whether audit action

ARIZONA REPUBLICAN PARTY

Page 3 of 3

will be initiated. Failure to comply with the provisions of the Act may also result in an enforcement action against the committee. Any response submitted by your committee will be placed on the public record and will be considered by the Commission prior to taking enforcement action. **Requests for extensions of time in which to respond will not be considered.**

Electronic filers must file amendments (to include statements, designations and reports) in an electronic format and must submit an amended report in its entirety, rather than just those portions of the report that are being amended. If you should have any questions regarding this matter or wish to verify the adequacy of your response, please contact me on our toll-free number (800) 424-9530 (at the prompt press 5 to reach the Reports Analysis Division) or my local number (202) 694-1152.

Sincerely,



Rosa Lewis  
Senior Campaign Finance Analyst  
Reports Analysis Division

SCHEDULE B (FEC Form 3X)  
ITEMIZED DISBURSEMENTS

Use separate schedule(s) for each category of the Detailed Summary Page	FOR LINE NUMBER: (check only one)		PAGE 7 OF 8			
	<input checked="" type="checkbox"/> 21b	<input type="checkbox"/> 22	<input type="checkbox"/> 23	<input type="checkbox"/> 24	<input type="checkbox"/> 25	<input type="checkbox"/> 26
	<input type="checkbox"/> 27	<input type="checkbox"/> 28a	<input type="checkbox"/> 28b	<input type="checkbox"/> 28c	<input type="checkbox"/> 29	<input type="checkbox"/> 30b

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (In Full)  
**JOE PAC**

Full Name (Last, First, Middle Initial) <b>A. CampaignSolutions, Inc.</b>		Date of Disbursement MM / DD / YYYY 10 / 05 / 2012	
Mailing Address 117 N Saint Asaph Street		Transaction ID : <b>SB21B-508-5192-e</b>	
City Alexandria	State VA	Zip Code 22314	Amount of Each Disbursement this Period 28.59
Purpose of Disbursement Credit Card Processing Fees		Category/ Type 001	
Candidate Name			
Office Sought: <input type="checkbox"/> House <input type="checkbox"/> Senate <input type="checkbox"/> President	Disbursement For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) ▼		
State:	District:		

Full Name (Last, First, Middle Initial) <b>B. Arizona Republican Party - STATE</b>		Date of Disbursement MM / DD / YYYY 10 / 04 / 2012	
Mailing Address 3501 N 24th Street		Transaction ID : <b>SB21B-4808-5134-e</b>	
City Phoenix	State AZ	Zip Code 85016-6607	Amount of Each Disbursement this Period 10000
Purpose of Disbursement Other: Non Federal Contribution		Category/ Type	
Candidate Name			
Office Sought: <input type="checkbox"/> House <input type="checkbox"/> Senate <input type="checkbox"/> President	Disbursement For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) ▼		
State:	District:		

Full Name (Last, First, Middle Initial) <b>C. Wells Fargo</b>		Date of Disbursement MM / DD / YYYY 10 / 11 / 2012	
Mailing Address 6930 Skyway		Transaction ID : <b>SB21B-3-5193-e</b>	
City Paradise	State CA	Zip Code 95969-3908	Amount of Each Disbursement this Period 33.01
Purpose of Disbursement Bank Fees		Category/ Type 001	
Candidate Name			
Office Sought: <input type="checkbox"/> House <input type="checkbox"/> Senate <input type="checkbox"/> President	Disbursement For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) ▼		
State:	District:		

<b>SUBTOTAL</b> of Disbursements This Page (optional).....▶	10061.60
<b>TOTAL</b> This Period (last page this line number only).....▶	10061.60